



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY - REGION II

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NEW YORK, NEW YORK 10007-1866

AUG 27 1996

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations
Roebling Steel Company Superfund Site

FROM: Richard L. Caspe, Director
Emergency and Remedial Response Division

TO: Bruce Means, Chair
National Remedy Review Board

This is in response to your memorandum, dated August 12, 1996, which documents the findings and recommendations of the National Remedy Review Board (NRRB) involving Region II's proposed remedial action for the Roebling Steel Company Superfund Site in Florence Township, New Jersey.

The Region appreciates the Board's general support for our proposed remedial action, Alternative 3, at the Roebling site. In addition, we welcome the Board's advisory recommendations and will include them in the Administrative Record for the site. Please be assured that the Region gave full consideration to those recommendations prior to releasing the Proposed Plan. This memorandum is intended to discuss our reaction to the Board's findings along with the resultant steps taken or to be taken in the future. This response will also be included in the Administrative Record.

The Board suggested that the Region consider an additional alternative that included the demolition of buildings and disposal of contaminated debris in a landfill to be constructed at the site. Under the approach suggested by the Board, the buildings would not be decontaminated prior to demolition and disposal.

An on-site landfiling alternative was rejected during the preliminary screening of remedial technologies due to State of New Jersey siting criteria for hazardous waste landfill facilities (N.J.A.C. 7:26-13). In particular, the criteria would prohibit the placement of a landfill in such close proximity to the nearby Roebling residential community or the adjacent Delaware River. In fact, a sizable portion of the site property is in a flood plain.

Notwithstanding the siting prohibition, the Region undertook a hypothetical cost analysis to determine whether the Board's suggested on-site landfilling alternative would be beneficial from a cost perspective. The results of that analysis indicated that on-site landfilling is unlikely to produce any cost savings compared to the approach proposed by the Region which includes the decontamination of the buildings prior to demolition and use of the construction debris as backfill on the site. In addition, an on-site landfill would require long-term maintenance and groundwater monitoring as well as institutional controls.

While the costs of the two approaches are similar, the Region's proposed remedial action would offer substantial benefits in redeveloping an old, abandoned industrial area in the community. The presence of a landfill on the Roebling site (assuming it could be constructed) would restrict the use of a portion of the property and may discourage future developmental activity. Consequently, after consideration of all factors, the Region identified its initial preference, Alternative 3, in the proposed Plan released for public comment.

The Board's remaining substantive comments involved activity which may be undertaken during the remedial design related to future use of the Roebling property and the-various buildings on the property.

The Region fully agrees with the Board's recommendation to refine the extent of decontamination of the specific buildings to meet acceptable risk levels based on the expected future use of the buildings. We anticipate that such an effort, which may include value engineering, would be performed as part of the remedial design work.

The Region also agrees with the Board's recommendation to work with any potential developers of the Roebling property. As was indicated during the' briefing with Regional staff on June 25, the town has already prepared a multi-use redevelopment plan. Once that plan moves moves closer to implementation and interested developers are identified, we will be able to coordinate with them to ensure that the extent of the cleanup of the various buildings and the land itself is consistent with the expected future use of the property.

In closing, the Region appreciates the opportunity to participate in the NRRB's review of the Roebling Steel Company site and is firmly committed to supporting this important Superfund Administrative Reform to help control remedy costs and promote consistent and cost-effective decisions.